

**FILED**

U.S. DISTRICT COURT  
EASTERN DIST. TENN.

Mattice | Carter

and 00/100s (\$195,000.00) Dollars. A copy of the Summons and Complaint are attached hereto as "Exhibit A." The dwelling coverage limit of the subject policy is greater than Seventy Five Thousand (\$75,000.00) Dollars; therefore, the amount in controversy exceeds Seventy Five Thousand (\$75,000.00) Dollars.

III.

This Notice of Removal is filed within the statutory period required by 28 USCA Section 1446. There is a complete diversity between the plaintiff and defendant and the amount in controversy exceeds the sum of Seventy Five Thousand (\$75,000.00) Dollars, exclusive of interest and cost.

IV.

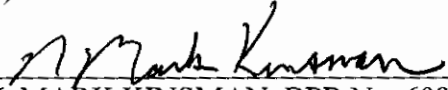
The plaintiff is a corporation organized under the laws of the State of Tennessee with its principal office in Dunlap, Tennessee. Defendant, American National Property and Casualty Company, is a corporation organized and existing under the laws of the State of Missouri with its principal place of business in Springfield, Missouri. It is not incorporated in Tennessee and does not have its principal business in Tennessee. There is complete diversity of citizenship between the parties as required by 28 USCA Section 1332. The amount in controversy exceeds Seventy Five Thousand (\$75,000.00) Dollars exclusive of interest and costs and is, therefore, within the statutory jurisdiction set forth at 28 USCA Section 1332.

V.

WHEREFORE, the defendant, American National Property and Casualty Company, respectfully requests the court to accept removal of this cause from the Chancery Court for Grundy County, Tennessee, and to proceed with this action in accordance with the law.

Respectfully submitted,

BAKER, KINSMAN, HOLLIS,  
CLELLAND & WINER, P.C.  
701 Market Street, Suite 1500.  
Chattanooga, TN 37402-4825  
(423) 756-3333

By:   
N. MARK KINSMAN, BPR No. 6093  
J. CHAD HOGUE, BPR No. 25457  
Attorneys for Defendant

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a copy of this pleading upon the below named attorney(s) either by messenger delivery or by depositing a copy of same in the U.S. Mail, regular post, with sufficient postage attached thereto for proper delivery.

L. Thomas Austin, Esq.  
Jennifer A. Mitchell, Esq.  
P.O. Box 666  
Dunlap, TN 37327

This 28 day of Sept, 2009.

By: 